



QEP Resources, Inc.  
Political Action Committee

Independence Plaza  
1050 17th Street, Suite 500  
Denver, CO 80265  
Tel: 303.672.6900  
Fax: 303.294.9632

RECEIVED  
2013 JUL 29 AM 7:59  
FEC MAIL CENTER

July 22, 2013

Federal Election Commission  
Washington, D.C. 20463

FEC:

I am contacting you in regards to (2) letters recently received (via email) pertaining to some compliance reporting issues with PAC ID #C00485730, and what we have done to correct these issues. I have included both FEC letters for your reference.

Issue 1: Multicandidate Status

The letter recognized that our PAC might have satisfied the criteria set forth at 11CFR 100.5(e)(3) for becoming a multicandidate committee, but had not yet been filed by our committee. After reviewing the criteria, the FEC is correct, and as of July 15, 2011, we did satisfy the multicandidate criteria. We submitted our 1M filing (e-filed) on July 11, 2013 to officially change our status to a Multicandidate PAC. All future filings and donations will reflect this change.

Issue 2: Schedule B supporting Line 23 of (2) 2012 reports discloses contributions to candidates for the 2012 Primary election; however the funds were disbursed after the election date.

We reviewed the 6 donations that were in question. None of the checks had specified what election to use the donation for, so after contacting all of the donation committees, we have confirmed that all of the funds were in fact used towards the 2012 General elections, not the 2012 Primary elections; we had just reported incorrectly on our side. We will be amending the July 15, 2012, and the October 15, 2012 3X filings, to reflect the correct elections the funds were used for, and with these amendments, we will be in accordance with FEC compliance guidelines.

Feel free to contact me or my assistant, Julie Olimpio, at 303-640-4271 or [julie.olimpio@qepres.com](mailto:julie.olimpio@qepres.com) if you have any questions regarding this letter.

Thank you,

Shane C. Schulz  
Treasurer, QEP Resources, Inc. PAC  
(a multicandidate committee)

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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RQ-2

June 27, 2013

SHANE SCHULZ, TREASURER  
QEP RESOURCES INC POLITICAL ACTION  
COMMITTEE  
1050 17TH STREET, SUITE 500  
DENVER, CO 80265

Response Due Date  
08/01/2013

IDENTIFICATION NUMBER: C00485730

REFERENCE: OCTOBER QUARTERLY REPORT (07/01/2012 - 09/30/2012)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 1 item(s):

1. Schedule B supporting Line 23 of your report discloses one or more contributions to candidates for the 2012 Primary election; however, the funds were disbursed after the election date(s) (see attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign. (11 CFR §§110.1(b)(3) and 110.2(b)(3))

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If the contributions in question should have been designated for debt retirement, you should amend your report to indicate "debt retirement," along with the year of election.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund. (11 CFR §103.3(b)(1) and (3))

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QEP RESOURCES INC POLITICAL ACTION COMMITTEE

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Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committees. In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contributions will be taken into consideration.

- For your information and consideration when preparing future filings, only contributions to federal candidates and political committees should be itemized on a separate Schedule B supporting Line 23 of the Detailed Summary Page. Contributions to non-federal candidates and committees should be itemized on Schedule B supporting Line 29. (11 CFR §104.3 (b)(1)) For your next filing, please refer to the instructions for each line when determining the proper categorization(s).

**Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1175.

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QEP RESOURCES INC POLITICAL ACTION COMMITTEE

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Sincerely,

*Sarah Juris*

Sarah Juris  
Campaign Finance Analyst  
Reports Analysis Division

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**Excessive, Prohibited, and Impermissible Contributions**  
**QEP RESOURCES, INC. POLITICAL ACTION COMMITTEE (C00485730)**

**Contributions Made After Election Date**

Recipient Name	Date	Amount	Election	Election (State-Date)
WILSON FOR SENATE	8/16/12	\$2,000.00	P2012	NM - 6/5/12
RODNEY ALEXANDER FOR CONGRESS	8/29/12	\$1,000.00	P2012	LA - 8/17/12
CANTOR FOR CONGRESS	8/30/12	\$2,500.00	P2012	VA - 6/12/12
PEOPLE FOR PEARCE	9/26/12	\$2,500.00	P2012	NM - 6/5/12

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

June 27, 2013

SHANE SCHULZ, TREASURER  
QEP RESOURCES INC POLITICAL ACTION  
COMMITTEE  
1050 17TH STREET, SUITE 500  
DENVER, CO 80265

Response Due Date  
08/01/2013

IDENTIFICATION NUMBER: C00485730

REFERENCE: JULY QUARTERLY REPORT (04/01/2012 - 06/30/2012)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 2 item(s):

1. Your filings disclose that your committee may have satisfied the criteria set forth at 11 CFR §100.5(e)(3) for becoming a multicandidate committee; however, the Commission has no record of a FORM 1M (Notification of Multicandidate Status) filed by your committee. Please be advised that once a political committee meets the certification requirements or becomes affiliated with an existing multicandidate committee, whether or not that political committee has certified its status as a multicandidate committee, it automatically attains multicandidate status and must file a FORM 1M (Notification of Multicandidate Status) within ten (10) calendar days. The certification requirements for multicandidate status have been satisfied when a political committee:

- 1 - has received contributions for federal elections from at least 51 persons;
- 2 - has been registered with the Commission for at least 6 months; and
- 3 - has made contributions to at least five federal candidates.

For further guidance on the multicandidate certification requirements, please see 11 CFR §§102.2(a)(3), 110.2(a)(1) and (2). Please submit a FORM 1M to disclose the required information for the public record. A copy of FEC FORM 1M can be downloaded from the FEC website at <http://www.fec.gov>, or requested through the FEC Fax line at (202) 501-3413.

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QEP RESOURCES INC POLITICAL ACTION COMMITTEE

Page 2 of 3

2. Schedule B supporting Line 23 of your report discloses one or more contributions to candidates for the 2012 Primary election; however, the funds were disbursed after the election date(s) (see attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign. (11 CFR §§110.1(b)(3) and 110.2(b)(3))

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If the contributions in question should have been designated for debt retirement, you should amend your report to indicate "debt retirement," along with the year of election.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund. (11 CFR §103.3(b)(1) and (3))

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committees. In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contributions will be taken into consideration.

- Your report discloses an in kind contribution made on behalf of a federal candidate. The original payments for the goods and services have been itemized as operating expenditures and included in the total for Line 21 of the Detailed Summary Page. In addition, the attribution to each federal candidate has been noted as a memo entry on supporting Schedule B for Line 23 (Contributions to Federal Candidates and Other Political Committees).

For your information and consideration when preparing future filings, please be

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QEP RESOURCES INC POLITICAL ACTION COMMITTEE

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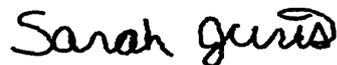
advised that the amount of such activity should be disclosed on Line 23 of the Detailed Summary Page so that the total amount of contributions to federal candidates (including in-kind contributions) are properly included on Line 23 of the Detailed Summary Page. (11 CFR §104.3 (b)(1)) For future filings, please refer to the Campaign Guide.

- For your information and consideration when preparing future filings, only contributions to federal candidates and political committees should be itemized on a separate Schedule B supporting Line 23 of the Detailed Summary Page. Contributions to non-federal candidates and committees should be itemized on Schedule B supporting Line 29. (11 CFR §104.3 (b)(1)) For your next filing, please refer to the instructions for each line when determining the proper categorization(s).

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1175.

Sincerely,



Sarah Juris  
Campaign Finance Analyst  
Reports Analysis Division

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**Excessive, Prohibited, and Impermissible Contributions**  
**QEP RESOURCES, INC. POLITICAL ACTION COMMITTEE (C00485730)**

**Contributions Made After Election Date**

Recipient Name	Date	Amount	Election	Election (State-Date)
Berg for Senate	6/14/12	\$2,500.00	P2012	ND - 6/12/12
Manchin for West.Virginia	6/14/12	\$1,000.00	P2012	WV - 5/8/12

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Federal Election Commission  
**ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS**  
 The FEC added this page to the end of this filing to indicate how it was received.

Hand Delivered Date of Receipt

USPS First Class Mail Postmarked  
7/22/13

USPS Registered/Certified Postmarked (R/C)

USPS Priority Mail Postmarked

USPS Express Mail Postmarked

Postmark Illegible

No Postmark

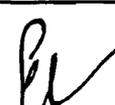
Overnight Delivery Service (Specify): Shipping Date  
Next Business Day Delivery

Received from House Records & Registration Office Date of Receipt

Received from Senate Public Records Office Date of Receipt

Received from Electronic Filing Office Date of Receipt

Other (Specify): Date of Receipt or Postmarked

  
 PREPARER  
 (7/2013)

7/29/13  
 DATE PREPARED

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